

Before the  
Federal Communications Commission  
Washington, DC 20554

In the Matter of )  
 )  
Amendment of Part 97 of the Commission's ) RM-10787  
Amateur Service Rules to eliminate )  
Morse code testing. )

To: The Commission

PERSONAL COMMENTS OF HANS BRAKOB, K0HB

OVERVIEW

These comments are submitted in response to the petition of NCVEC which requests elimination of test Element 1 (Morse Code) from the Amateur Radio service rules.

I. Discussion:

The instant petition requests the elimination of Element 1 (5WPM Morse code test) from the required test for General and/or Extra Class licenses in the Amateur Radio service.

I find no persuasive argument for continuation of this test, and support the petition to discontinue testing new applicants with Element 1.

I am concerned, however, that other elements of the qualification tests are not adequate to ensure a high level of expertise in new applicants to the Amateur Radio service, and propose changes in the licensing structure to ensure that all 5 points of CFR 47 paragraph 97.1 (Basis and Purpose) are reasonably addressed in the qualification process.

II Proposal:

I propose that no new applicants be accepted for the current license classes and that after some reasonable grace period, no upgrades be available in the current licensing structure.

A. New License Classes:

I propose that new license applications be available in two classes, namely "Class B" and "Class A".

The "Class B" license would have an entry-level test (basic regulations, safety, operating procedures, basic DC and AC electronics). This class would have full frequency and mode privileges, power limited to 50W output. The license would be issued for a period of 10 years, and be non-renewable. holders of this license would be required to have 2 years

experience as a licensee ("time in grade") before being eligible to upgrade to "Class A".

The "Class A" license test would be of a difficulty level similar to the current Extra class test, and would have full privileges at power levels up to 1500W, equivalent to current Extra Class license holders. This license would be issued permanently without requirement for renewal.

B. Status of current licensees.

Current licenses could be renewed indefinitely, and would retain their current operating privileges.

Current Novice, Technician, General, and Advanced class licensees could upgrade to "Class A" at any time.

Respectfully submitted,

H. Hans Brakob, K0HB